

TSD File Inventory Index

Date: December 28, 2007

Initial: CMH/ewad

Facility Name: <u>UCAR Carbon Company (Palma Site)</u>			
Facility Identification Number:			
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status <u>A.2</u>	1	.1 Correspondence <u>B.1.2</u>	1
.1 Correspondence	✓	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	✓	C.1 Compliance - (Inspection Reports)	
.3 Part A Application and Amendments	✓	C.2 Compliance/Enforcement <u>C.2</u>	1
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence <u>A.4.1-A.4.4-A.4.5</u>	1	.4 RFA Reports <u>D.1.4</u>	1
.2 Closure/Post Closure Plans, Certificates, etc <u>See A.4.1</u>		D.2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	
		5. RFI OAPP	

Total 5

.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI QAPP Correspondence		.9 Environmental Justice	
7			

Note: Transmittal Letter to Be Included with Reports.

Comments:



UCAR CARBON COMPANY INC., a GrafTech International Ltd. company

12900 Snow Road Parma, Ohio 44130
(216) 676-2612
Facsimile (216) 676-2291

Vicki A. Vesel
Manager, Health, Safety and Environmental Protection

October 17, 2005

Regional Administrator USEPA Region 5
77 West Jackson Boulevard
Chicago IL 60604-3507
Certified Mail # 7099 3400 0008 1023 1175

Regional Administrator Ohio EPA
122 S. Front St.
Columbus, Ohio 43215
Certified Mail # 7099 3400 0008 1023 1182

Re:
Exception Report for non confirmation of delivery Manifest #3677147 shipped 9/1/05

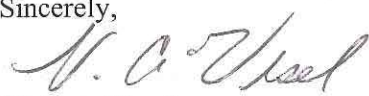
Dear Regional Administrator:

In accordance with CFR title 40 (761.215) I have contacted the transporter regarding the failure to receive a copy of the above referenced manifest with the handwritten signature of the owner or operator of the designated commercial storage or disposal facility within 35 days of the date the waste was accepted by the initial transporter. A copy of this manifest is enclosed.

The following action was taken in an attempt to determine the status of the waste:

V. Vesel Mgr. HS&EP UCAR Carbon Company contacted Steven Blaine Technical Service Representative for Onyx Environmental Services (937) 859-2218 to inform him that the return copy of the manifest was not received. Steven Blaine attempted to call the disposal facility and determined (10/13/05) that, due to hurricane Rita the disposal facility was still temporarily closed. He was able to reach a facility representative 10/14/05 who informed him that it was likely that the waste was received and that the manifest is sitting in the backlog of manifest copies awaiting return to generators.

Steven Blaine was able to secure a fax copy of the signed manifest and faxed it to me the morning of 10/17/05.

Sincerely,

Vicki A. Vesel
Mgr. HS&EP

Enclosure: copy of manifest #3677147

Elm, Texas 78741-3087



Form approved, OMB No. 2050-0039.

004-17-2005 07:55am

03 MAY 1989

5HR-12

Mr. Dave Mieskowski
Union Carbide Corporation
Parma Technical Center
P.O. Box 6116
Cleveland, Ohio 44101

Re: Compliance Letter
Union Carbide Corporation
Parma Technical Center
OHD 003 926 748

Dear Mr. Mieskowski:

On January 27, 1989, the Ohio Environmental Protection Agency (OEPA), representing the United States Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above referenced facility. The purpose of the inspection was to determine the compliance status of this facility with respect to the applicable hazardous waste management requirements of RCRA, including the land disposal restrictions of certain spent solvents (F001-F005) and dioxins which became effective on November 8, 1986, and certain hazardous wastes commonly referred to as California List wastes which became effective on July 8, 1987. Additionally, the land disposal restrictions for First Third of Scheduled Wastes became effective on August 8, 1988. Regulations are set forth at 40 CFR Part 268 and in revisions to 40 CFR Parts 260-265, 268, 270, and 271.

As a result of the inspection, it appears that the subject facility is in compliance with the land disposal requirements found at 40 CFR Part 268.

Enclosed is a copy of the inspection report for your records. If you have any questions regarding this correspondence, please contact Mr. Gregory T. Carlson of my staff at (312) 886-8095.

Sincerely yours,

Sally K. Swanson, Chief
IN/MN/OH Enforcement Program Section

Enclosure

cc: Mike Savage, OEPA
Gregory Taylor, Northeast District Office

bcc: Sally Swanson, REB

5HR-12:G.CARLSON:sm:8-8093:05/01/89:disk #2:PC:FILENAME:MIESKOWS

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	<i>7/5/89</i>	<i>ab for SLS 5-2-89</i>	



State of Ohio Environmental Protection Agency

Northeast District Office

10 E. Aurora Road
Columbus, Ohio 44087-1969
(216) 425-9171



Richard F. Celeste
Governor

February 7, 1989

RE: UNION CARBIDE
PARMA TECHNICAL CENTER
CUYAHOGA COUNTY
OHD 003-926-748
G/TSD 02-18-0104

CERTIFIED MAIL

Dave Mieskowski
Manager
Health, Safety and Environmental Protection
Union Carbide Corporation
Parma Technical Center
P. O. Box 6116
Cleveland, Ohio 44101

Dear Mr. Mieskowski:

On January 27, 1989, I inspected your facility for compliance with state and federal hazardous waste regulations. At the time of the inspection Vicki Vesel and yourself represented the facility. During the inspection the following violations were noted:

1. The facility must indicate in the waste analysis plan the frequency in which analysis of the waste will be reviewed or repeated as required in OAC 3745-65-13 (B)(4) and 40 CFR 265.13(b)(4).
2. The waste solvent container in the storage shed outside the shipping and receiving department was open in violation of regulation OAC 3745-66-73(A) and 40 CFR 265.173(a).

Documentation is to be submitted to this office within (30) thirty days of receipt of this letter indicating that the above violations have been corrected and that the facility has returned to compliance.

It is understood that a closure plan will be submitted soon to address the closure of the closure of the three storage area prior to their up-grading. Once these areas have been up-graded the facility must see to it that the contingency plan, closure plan, etc. are also revised to include the new storage systems.

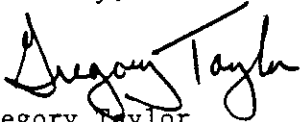
Please submit to this office an explanation of how the wastes will be handled during the closure process.

Please note that the Land Ban Restriction inspection, completed as part of this inspection is being forwarded to the U.S. EPA, Region V for appropriate follow-up.

Mr. Dave Mieskowski
Union Carbide Corporation
February 7, 1989
Page -2-

If you have any questions regarding this inspection, please feel free to call me at (216)425-9171.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gregory Taylor".

Gregory Taylor
Environmental Scientist
Division of Solid and Hazardous Waste
Management

GT/sp

cc: Dave Sholtis, DSHWM, Central Office
Debby Berg, DSHWM, NEDO

1-2-89 9:30 Am
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAD # 02-18-0104

GENERAL INFORMATION UCAR Carbon Co. Inc.

U.S. EPA I.D. # OH D 003-926-748

Facility: Union Carbide Corporation
Parma Technical Center

Address: 12900 Snow Road

City: Parma

State: Ohio

Zip Code: 44130

County: Cuyahoga

Telephone: (216) 676-2000

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>David A. Mieskowski</u>	<u>Manager Health, Safety and Environmental Protection</u>	<u>(216)-676-2228</u>
2.	<u>Vicki Vesel</u>	<u>Occupational Health & Environment Coordinator</u>	<u>(216)-676-2228</u>
3.			

INSPECTOR(S)

1.	<u>Gregory Taylor</u>	<u>Environmental Scientist</u>	<u>(216) 425-9171</u>
2.			
3.			

INSTALLATION ACTIVITY

Mark One

If the site is a TSDF, check the boxes indicating which areas were reviewed.

☐ Generator only (G)

☐ Transporter (T)

☐ TSDF only

☐ G-T

☒ G-TSDF

☐ T-TSDF

☐ G-T-TSDF

☒ General Facility Standards, Preparedness
and Prevention, Contingency and Emergency
Manifests/Records/Reporting, Closure

☒ Containers S01

☐ Tanks S02/T01

☐ Surface Impoundments S04/T02

☐ Incineration/Thermal Treatment

☐ Waste Piles S03

☐ Land Treatment D01

☐ Landfills D00

☐ Chemical/Physical/
Biological T04

☐ Groundwater Monitoring

☐ Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has the facility submitted a Part A to Ohio?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. If "yes", is it complete and accurate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>will be reviewing soon</u>
3. Has the facility submitted a Part B?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>under review</u>
4. Was advance notice of the inspection given? If so, how far in advance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>2 weeks</u>

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

UCAR Carbon Company is a research and development facility specializing in graphite electrode development, graphite foil development and the development of specialized graphite forms for industry use.

In conducting research and development the waste stream varies due to the type of chemicals required for specific projects. During the past year U103 and P030 wastes were produced along with different quantities of F001, F002, F003 and F005 wastes. The maintenance department has one parts cleaner which is changed yearly.

The facility has two permitted storage areas; the outside storage area is west of the pilot plant where wastes are stored in 55 gallon drums; inside waste storage room is located near the shipping and receiving department, the wastes are segregated on shelves and stored in their original containers and lab-packed immediately prior to off-site shipment.

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b) The date that accumulation began is clearly marked on each container.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

	Yes	No	N/A	Remark #
<u>Subpart B: General Facility Standards</u>				
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The operator has a written waste analysis plan which describes analytical parameters; test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Need additional information on Testing frequency
3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				
a) A 24-hour surveillance system, <u>or</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) An artificial or natural barrier <u>and</u> a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15]	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(B)(C)]	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]				
a) Protection from sources of ignition.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
b) Physical separation of incompatible waste materials.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31] ___ ☒ ___

2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]
 - a) Internal alarm system. ___ ☒ ___
 - b) Access to telephone, radio or other device for summoning emergency assistance. ___ ☒ ___
 - c) Portable fire control equipment. ___ ☒ ___
 - d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers. ___ ☒ ___

3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33] ___ ☒ ___

4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34] ___ ☒ ___

5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35] ___ ☒ ___

6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)] ___ ☒ ___

7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)] ___ ___ ☒ ___

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:
 - a) Actions to be taken by personnel in the event of an emergency incident. ✓
 - b) Arrangements or agreements with local or state emergency authorities. ✓
 - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. ✓
 - d) A list of all emergency equipment including location, physical description and outline of capabilities. ✓
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)] ✓
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)] ✓
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54] ✓
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55] ✓
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)] ✓

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:

- a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]
- b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
- c) The estimated (or actual) weight, volume or density of the waste material(s).
- d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
- e) The present physical location of each hazardous waste within the facility.
- f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)]
- g) Records of any waste analyses and trial tests required to be performed.
- h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).
- i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]
- j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO <u>ONLY</u> OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.				
3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) <u>or</u> the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
b) In good physical condition (265.171) [3745-66-71]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

- | | | | | |
|---|-------------------------------------|--------------------------|-------------------------------------|--------------------------|
| 1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| a) A description of how and when the facility will be closed.
(265.112(a)(1)) [3745-66-12(A)(1)] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) A description of steps taken to decontaminate facility equipment. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) The year closure is expected to begin and a schedule for the various phases of closure. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart II: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]

a) A closure trust fund, or

b) A surety bond, or

c) A closure letter of credit, or

d) A combination of financial mechanisms.

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?

3. When was the most recent estimate made?

4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?

5. When was the most recent estimate made?

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
✓	_____	_____	4186,630
_____	_____	_____	10/88
_____	_____	✓	_____
_____	_____	✓	_____

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: _____

U.S. EPA I.D. No.: OH D 003-926-748

Street: 2000 S. Main Road

City: Dayton State: Ohio Zip Code: 45424

Telephone: (513) 251-2300

Operator: _____

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Owner: _____

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Inspection Date: 11/27/88 Time: 9:30 - 3:00 Weather Conditions: Partly Cloudy

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>Gregory Taylor</u>	<u>Ohio EPA</u>	<u>(216) 425-9171</u>

Facility Representatives: Dave Mieszkowski, RCRA Officer

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status</u> <u>California List</u>	<u>First Third</u>
Generator	_____	<u>/</u>	_____	<u>/</u>
Transporter	_____	_____	_____	_____
Treater	_____	_____	_____	_____
Storer	_____	<u>/</u>	_____	_____
Disposer	_____	_____	_____	_____

INSPECTION SUMMARY

1. To cover design and construction development, including, in graphite sectional development, graphite fuel development and the arrangement of graphite forms for industry use.

2. In construction and development the waste stream is a type of camera used for specific projects. Having the just right type of POB waste and pressure using with various quantities of Fuel, Fuel, Fuel and Fuel waste.

RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	<u>F-Solvent Wastes</u>					
1.	F001	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2.	F002	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3.	F003	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4.	F004	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5.	F005	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

- Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cadmium	100 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chromium VI	500 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lead	500 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mercury	20 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Nickel	134 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Selenium	100 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Thallium	130 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm _____

500 ppm _____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

_____ Yes _____ No _____ NA

If yes, state reasons for mixing:

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes

- Note: (1) The detailed description for waste codes are listed in Appendix C.
 (2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*	_____	_____	_____	_____	_____
F007	_____	_____	_____	_____	_____
F008	_____	_____	_____	_____	_____
F009	_____	_____	_____	_____	_____
F019	_____	_____	_____	_____	_____
K001*	_____	_____	_____	_____	_____
K004*	_____	_____	_____	_____	_____
K008*	_____	_____	_____	_____	_____
K011	_____	_____	_____	_____	_____
K013	_____	_____	_____	_____	_____
K014	_____	_____	_____	_____	_____
K015*	_____	_____	_____	_____	_____
K016*	_____	_____	_____	_____	_____
K017	_____	_____	_____	_____	_____
K018*	_____	_____	_____	_____	_____
K019*	_____	_____	_____	_____	_____
K020*	_____	_____	_____	_____	_____
K021*	_____	_____	_____	_____	_____
K022*	_____	_____	_____	_____	_____
K024*	_____	_____	_____	_____	_____
K025*	_____	_____	_____	_____	_____
K030*	_____	_____	_____	_____	_____
K031	_____	_____	_____	_____	_____
K035	_____	_____	_____	_____	_____
K036*	_____	_____	_____	_____	_____
K037*	_____	_____	_____	_____	_____
K044*	_____	_____	_____	_____	_____
K045*	_____	_____	_____	_____	_____
K046*	_____	_____	_____	_____	_____

	Gen.	Treat	Store	Disc.	Trans.
K047*	_____	_____	_____	_____	_____
K048*	_____	_____	_____	_____	_____
K049*	_____	_____	_____	_____	_____
K050*	_____	_____	_____	_____	_____
K051*	_____	_____	_____	_____	_____
K052*	_____	_____	_____	_____	_____
K060*	_____	_____	_____	_____	_____
K061*	_____	_____	_____	_____	_____
K062*	_____	_____	_____	_____	_____
K069*	_____	_____	_____	_____	_____
K071*	_____	_____	_____	_____	_____
K073*	_____	_____	_____	_____	_____
K083*	_____	_____	_____	_____	_____
K084	_____	_____	_____	_____	_____
K085	_____	_____	_____	_____	_____
K086*	_____	_____	_____	_____	_____
K087*	_____	_____	_____	_____	_____
K099*	_____	_____	_____	_____	_____
K100*	_____	_____	_____	_____	_____
K101*	_____	_____	_____	_____	_____
K102*	_____	_____	_____	_____	_____
K103*	_____	_____	_____	_____	_____
K104*	_____	_____	_____	_____	_____
K106*	_____	_____	_____	_____	_____
P001	_____	_____	_____	_____	_____
P004	_____	_____	_____	_____	_____
P005	_____	_____	_____	_____	_____
P010	_____	_____	_____	_____	_____
P011	_____	_____	_____	_____	_____
P012	_____	_____	_____	_____	_____
P015	_____	_____	_____	_____	_____
P016	_____	_____	_____	_____	_____
P018	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
P020	_____	_____	_____	_____	_____
P030	_____/____	_____	_____/____	_____	_____
P036	_____	_____	_____	_____	_____
P037	_____	_____	_____	_____	_____
P039	_____	_____	_____	_____	_____
P041	_____	_____	_____	_____	_____
P048	_____	_____	_____	_____	_____
P050	_____	_____	_____	_____	_____
P058	_____	_____	_____	_____	_____
P059	_____	_____	_____	_____	_____
P063	_____	_____	_____	_____	_____
P068	_____	_____	_____	_____	_____
P069	_____	_____	_____	_____	_____
P070	_____	_____	_____	_____	_____
P071	_____	_____	_____	_____	_____
P081	_____	_____	_____	_____	_____
P082	_____	_____	_____	_____	_____
P084	_____	_____	_____	_____	_____
P087	_____	_____	_____	_____	_____
P089	_____	_____	_____	_____	_____
P092	_____	_____	_____	_____	_____
P094	_____	_____	_____	_____	_____
P097	_____	_____	_____	_____	_____
P102	_____	_____	_____	_____	_____
P105	_____	_____	_____	_____	_____
P108	_____	_____	_____	_____	_____
P110	_____	_____	_____	_____	_____
P115	_____	_____	_____	_____	_____
P120	_____	_____	_____	_____	_____
P122	_____	_____	_____	_____	_____
P123	_____	_____	_____	_____	_____
U007	_____	_____	_____	_____	_____
U009	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat.	Store	Disp.	Trans.
U010	_____	_____	_____	_____	_____
U012	_____	_____	_____	_____	_____
U016	_____	_____	_____	_____	_____
U018	_____	_____	_____	_____	_____
U019	_____	_____	_____	_____	_____
U022	_____	_____	_____	_____	_____
U029	_____	_____	_____	_____	_____
U031	_____	_____	_____	_____	_____
U036	_____	_____	_____	_____	_____
U037	_____	_____	_____	_____	_____
U041	_____	_____	_____	_____	_____
U043	_____	_____	_____	_____	_____
U044	_____	_____	_____	_____	_____
U046	_____	_____	_____	_____	_____
U050	_____	_____	_____	_____	_____
U051	_____	_____	_____	_____	_____
U053	_____	_____	_____	_____	_____
U061	_____	_____	_____	_____	_____
U063	_____	_____	_____	_____	_____
U064	_____	_____	_____	_____	_____
U066	_____	_____	_____	_____	_____
U067	_____	_____	_____	_____	_____
U074	_____	_____	_____	_____	_____
U077	_____	_____	_____	_____	_____
U078	_____	_____	_____	_____	_____
U086	_____	_____	_____	_____	_____
U089	_____	_____	_____	_____	_____
U103	✓	_____	✓	_____	_____
U105	_____	_____	_____	_____	_____
U108	_____	_____	_____	_____	_____
U115	_____	_____	_____	_____	_____
U122	_____	_____	_____	_____	_____
U124	_____	_____	_____	_____	_____

NTC
4/27/89

	Gen.	Treat.	Store	Disp.	Treat.
U129	_____	_____	_____	_____	_____
U130	_____	_____	_____	_____	_____
U133	_____	_____	_____	_____	_____
U134	_____	_____	_____	_____	_____
U137	_____	_____	_____	_____	_____
U151	_____	_____	_____	_____	_____
U154	_____	_____	_____	_____	_____
U155	_____	_____	_____	_____	_____
U157	_____	_____	_____	_____	_____
U158	_____	_____	_____	_____	_____
U159	_____	_____	_____	_____	_____
U171	_____	_____	_____	_____	_____
U177	_____	_____	_____	_____	_____
U180	_____	_____	_____	_____	_____
U181	_____	_____	_____	_____	_____
U188	_____	_____	_____	_____	_____
U192	_____	_____	_____	_____	_____
U200	_____	_____	_____	_____	_____
U209	_____	_____	_____	_____	_____
U210	_____	_____	_____	_____	_____
U211	_____	_____	_____	_____	_____
U219	_____	_____	_____	_____	_____
U220	_____	_____	_____	_____	_____
U221	_____	_____	_____	_____	_____
U223	_____	_____	_____	_____	_____
U226	_____	_____	_____	_____	_____
U227	_____	_____	_____	_____	_____
U228	_____	_____	_____	_____	_____
U237	_____	_____	_____	_____	_____
U238	_____	_____	_____	_____	_____
U243	_____	_____	_____	_____	_____
U249	_____	_____	_____	_____	_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
☐ Pharmaceutical wastewater containing spent methylene chloride
☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes ☐ No ☐ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (c))?

☐ Yes ☐ No ☐ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

3. First Third Waste: Does the generator correctly determine the appropriate treatability group of the waste?

✓ Yes No NA

If yes, check the appropriate treatability group.

Wastewater (less than 1% TOC by weight and less than 1% filterable solids)	
Nonwastewaters	

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
P30		✓
11103		✓

B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

✓ Yes No NA

How was this determination made?

- Knowledge of waste

☒ Yes ☐ No

If yes, is any supporting data available for review? Describe how this is adequate. Waste Profile Information from
Lead form

- TCLP

_____ Yes _____ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

6. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [263.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream: Spent Etch Solution and degreasing solvent

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [263.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

2: Chemicals extracted

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☐ No ☐ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes ☐ No ☐ NA

What type of absorbent is used? _____
Check the types of waste to which absorbent is added.

☐ Liquid hazardous waste having a pH less than or equal to 2

☐ Liquid hazardous waste containing metals

☐ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☐ Yes ☐ No ☐ NA

If yes, is any supporting data available for review? Describe how this is adequate. _____

- Testing ☐ Yes ☐ No ☐ NA

If yes, list test method used: _____

- d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

☐ Yes ☐ No ☐ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

☐ Yes ☐ No ☐ NA

3. First Third Wastes:

- a. Does the generator correctly determine the appropriate treatment standard of the waste?

☐ Yes ☐ No ☒ NA

Note: The treatment standards for first third wastes are given in Appendix D.

- b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

☐ Yes ☐ No ☒ Soft hammer

If yes, specify the waste stream: _____

How was this determination made?

- Knowledge of waste

☐ Yes ☐ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

☐ Yes ☐ No ☐ NA

- Total Constituent Analysis

☐ Yes ☐ No ☐ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test the waste when a process or waste stream changes?

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes ☐ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes ☐ No

- b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes ☐ No

c. Does notification contain the following?

EPA Hazardous waste number(s) ☒ Yes ☐ No

Applicable treatment standards ☒ Yes ☐ No

Manifest number ☒ Yes ☐ No

Waste analysis data, if available ☒ Yes ☐ No

Identify off-site treatment or storage facilities: Chemical Waste
Management Inc. Emery, Alabama

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No

f. Does notification contain the following?

EPA Hazardous waste number(s) ☐ Yes ☐ No

Applicable treatment standards ☐ Yes ☐ No

Manifest number ☐ Yes ☐ No

Waste analysis data, if available ☐ Yes ☐ No

Certification that the waste meets treatment standards ☐ Yes ☐ No

Identify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

☐ Yes ☐ No ☒ NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

☐ Yes ☐ No

- i. If yes, does the notification contain the following information?

EPA Hazardous waste number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
The corresponding treatment standards and all applicable prohibitions	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Date the waste is subject to the prohibitions	<input type="checkbox"/> Yes	<input type="checkbox"/> No

- j. Does the generator retain copies of all notices and certifications for a period of 5 years?

☒ Yes ☐ No

D. Demonstration and Certification -- "Soft Hammer" Wastes

- a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?
- ☒ Yes ☐ No
- b. Has the generator submitted to the Regional Administration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Addresses	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Telephone Numbers	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Contact dates	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

Attach a copy of the demonstration and certification

- c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

☐ Yes ☐ No

If yes, attach a copy of written discussion.



*File Disp
CWA 112*

UNION CARBIDE CORPORATION

12900 SNOW ROAD, PARMA, OHIO

AREA CODE: 216 676-2000

MAIL ADDRESS: P. O. BOX 6116, CLEVELAND, OH 44101

Parma Technical Center

Carbon Products Division

October 27, 1988

Regional Administrator
U.S. EPA, Region 5
RCRA Waste Management Division
P. O. Box A3587
Chicago, IL 60690

Dear Sirs:

Please find attached our Soft Hammer Demonstration/Certification for
HCL Waste destined for Trade Waste Incineration.

Sincerely,

A handwritten signature in dark ink, appearing to read "D. A. Mieskowski".

D. A. Mieskowski
Manager; Health, Safety,
and Environmental Protection

DAM/dml/1631v

Attachment



DATE:

TO: Regional Administrator

ADDRESS: USEPA Region 5
RCA Waste mgmt Div.
PO Box 43587 Chicago Ill. 60690

RE: SOFT HAMMER DEMONSTRATION/CERTIFICATION FOR MATERIALS
DESTINED FOR TRADE WASTE INCINERATION

In accordance with the Environmental Protection Agency's land disposal restrictions governing the first third scheduled wastes,

Union Carbide Corp. has enclosed a soft hammer
(Generator name)

demonstration and certification as per 40 CFR 268.8(a)(1) for

DWM Profile IL2705 bearing EPA waste code(s) _____

4210.

This demonstration (see reverse) has been prepared following communication with Chemical Waste Management and reflects our efforts to locate practically available treatment which affords the greatest environmental benefit. We believe that the information submitted is true, accurate, and complete. Based on this information we have determined that incineration is the best practically available treatment.

If any further information is required, please contact me at

(216) 676-2228
(Phone Number)

Sincerely,

SA Mierkowski
(Signature)

Through discussion with Chemical Waste Management and in accordance with 40 CFR 268.8(a)(1) I have developed this demonstration which is applicable to the following EPA waste codes:

K011	P030	P081	U012	U051	U108	U171	U226
K013	P036	P082	U016	U053	U115	U177	U227
K014	P037	P084	U018	U061	U122	U180	U228
K017	P039	P089	U019	U063	U124	U185	U237
X035	P041	P094	U022	U064	U129	U188	U238
K073	P048	P097	U029	U066	U130	U192	U248
X085	P050	P102	U031	U067	U133	U200	
	P058	P105	U036	U074	U134	U209	
P001	P059	P108	U037	U077	U137	U210	
P004	P063	P123	U041	U078	U154	U211	
P005	P068		U043	U086	U155	U219	
P016	P069	U007	U044	U089	U157	U220	
P018	P070	U009	U046	U103	U158	U221	
P020	P071	U010	U050	U105	U159	U223	

FACILITIES CONTACTED:

FACILITY: Solvent Resource & Recovery Inc.
4301 Infirmary Road, West Carrollton, OH 45449
PHONE: (513) 859-6101
CONTACT: Carol Moody, Laboratory Manager
DATE: September 22, 1988
TREATMENT: Solvent recovery, Fuels blending
RESPONSE: Facility unable to treat EPA listed wastes currently subject to the soft hammer; facility does not accept lab packs for solvent recovery or fuels blending.

FACILITY: Trade Waste Incineration
7 Mobile Avenue, Sauget, IL 62201
PHONE: (618) 271-2804
CONTACT: Dennis Warchol, Environmental Manager
DATE: September 22, 1988
TREATMENT: Incineration
RESPONSE: Incineration is the practically available technology which yields the greatest environmental benefit. The waste is principally organic residues which are best destroyed by incineration.

FACILITY: Adams Center Landfill
4636 Adams Center Road, Fort Wayne, IN 46806
PHONE: (219) 447-5585
CONTACT: Dennis Romankowski, Environmental Manager
DATE: September 22, 1988
TREATMENT: Land Disposal/Stabilization
RESPONSE: Facility has the capability to meaningfully reduce the toxicity and/or mobility of inorganic constituents however lab packs are not accepted for stabilization.

- d. Does the generator ship his waste off-site for treatment?

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

- e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

_____ Yes _____ No

- f. Does the generator provide certification with each subsequent shipment of wastes?

_____ Yes _____ No

- g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number _____ Yes _____ No

(ii) Manifest number _____ Yes _____ No

(iii) Waste analysis data, if available _____ Yes _____ No

- h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

_____ Yes _____ No

E. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes _____ No

If yes, list types of waste treatment units and processes:

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

N/A

- A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

_____ Yes _____ No

If yes, check the appropriate regulatory status:

_____ Interim status for storage

_____ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: _____

- B. Does the transporter mix, combine, or recontainerize wastes?

_____ Yes _____ No

- C. Is the waste treated in an exempt treatment process on-site?

_____ Yes _____ No

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☐ Yes ☒ No ☐ NA
 o California List ☐ Yes ☐ No ☐ NA
 o First Third ☐ Yes ☒ No ☐ NA

Analysis plan is being revised

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☐ Yes ☒ No

- a. What date was the waste analysis plan last revised? 1-24-84

- b. Are analyses conducted on-site or off-site?

☐ On-site ☒ Off-site

Identify off-site lab: Chem Waste Management

- c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☒ No ☐ NA *SW-846 methods*

- d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

☐ Yes ☒ No ☐ NA

Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

- e. Describe the frequency of sampling: Sample is collected by
ship once from June to September

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☒ Yes ☐ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

☐ Tanks
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☐ Yes ☒ No ☐ NA

*containers were not marked as such & having
them they were marked as waste materials.*

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?

☒ Yes ☐ No ☐ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

☐ Yes ☐ No

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

____ Yes ☒ No ____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

____ Yes ____ No

If yes, state how: _____

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

____ Yes ____ No ☒ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

____ Yes ____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

____ Yes ____ No ☒ NA

C. Treatment *NA*

1. Does the facility treat restricted wastes other than in surface impoundments?

____ Yes ____ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

_____ Yes _____ No

4. Is dilution used as a substitute for treatment?

_____ Yes _____ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

_____ Yes _____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s) _____ Yes _____ No

Applicable treatment standards _____ Yes _____ No

Manifest number _____ Yes _____ No

Waste analysis data, if available _____ Yes _____ No

Certification that the waste meets the treatment standards _____ Yes _____ No

Identify off-site disposal facilities: _____

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

_____ Yes _____ No

D. Treatment in Surface Impoundments *NA*

1. Are restricted wastes placed in surface impoundments for treatment?

_____ Yes _____ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

_____ Yes _____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No _____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

_____ Yes _____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

_____ Yes _____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

- a. If yes, are sludge and supernatant removed adequately on an annual basis?

_____ Yes _____ No

- b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

- c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

- d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

E. Land Disposal *NA*

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

_____ Yes _____ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

_____ Yes _____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a)(5)]?

_____ Yes _____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

_____ Yes _____ No

If yes, at what frequency? _____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____ Yes _____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____ Yes _____ No

7. Does the facility have notices [263.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

_____ Yes _____ No _____ NA

8. What is the volume of the restricted wastes disposed of to date?

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

_____ Yes _____ No _____ NA

APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
carbon tetrachloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
chlorinated fluorocarbons	<input type="checkbox"/> Yes	<input type="checkbox"/> No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
chlorobenzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichlorofluoromethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,2-trichloro-1,1,2-trifluoroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ortho-dichlorobenzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
acetone	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl acetate	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl benzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl ether	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methyl isobutyl ketone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
n-butyl alcohol	<input type="checkbox"/> Yes	<input type="checkbox"/> No
cyclohexanone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methanol	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic? *NA*

☐ Yes ☐ No

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid
nitrobenzene

___Yes ___No
___Yes ___No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene
methyl ethyl ketone
carbon disulfide
isobutanol
pyridine

☒Yes ___No
☒Yes ___No
___Yes ___No
___Yes ___No
___Yes ___No

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

- (a) Are the constituents used as chemical carriers?

☒Yes ___No

If yes, list the constituents.

MEK

- (b) Are the constituents used for degreasing/cleaning?

☒Yes ___No

If yes, list the constituents.

Methyl Ethyl Ketone, Acetone, Toluene

- (c) Are the constituents used as diluents?

___Yes ___No

If yes, list the constituents.

- (d) Are the constituents used as extractants?

___Yes ___No

If yes, list the constituents.

(e) Are the constituents used for fabric scouring?

____ Yes X No

If yes, list the constituents.

(f) Are the constituents used as reaction and synthesis media?

____ Yes X No

If yes, list the constituents.

If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.)
____ Yes X No

8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
<u>68%</u>	mineral spirits
100%	

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains only F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
<u>51%</u>	ethyl ether
100%	

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene (F003)
12%	TCE (F001)
<u>38%</u>	mineral spirits
100%	

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.



Re: DHMM

Union Carbide, Parma Technical Center
#02-13-0104

G/T SD

Ms. Eugenia Betonte
Environmental & Health Coordinator
Union Carbide Corporation
Parma Technical Center
P.O. Box 6116
Cleveland, Ohio 44101

July 19,

OHIO 003 926 748

Dear Mr. Betonte:

Thank you for the courtesies extended by you during my July 12, 1983, inspection at the Union Carbide, Parma Technical Center. The purpose of the inspection was to ascertain compliance with State and Federal hazardous waste management rules. A copy of the inspection report is enclosed for your information.

The inspection report indicates that this storage facility, located at Parma Technical Center, 12900 Snow Road, Parma, Ohio, is at this time in general compliance with the applicable Ohio Hazardous Waste Rules OAC 3745-50 thru 3745-69 and Federal Hazardous Waste Regulations 40 CFR 260-269. The report will become a part of the official records of the Ohio Environmental Protection Agency's Division of Hazardous Materials Management and will be forwarded to Mr. Jim Mayka of U.S. EPA - Region V.

Please send copies of your financial assurance/liability insurance documents to Ms. Debbie Tegtmeyer, Division of Hazardous Materials Management, EPA, P.O. Box 1049, Columbus, Ohio 43216.

For your consideration, you may wish to begin expansion of your Waste Management Plan in preparation for a Part B submittal. Narrative explanations, and appropriate additions, as we discussed. As a final comment, please include my remarks in the inspection report regarding the preparation of waste manifests.

Should you have any further questions, please feel free to call.

Sincerely,

Deborah J. Berg, R.S.
District Inspector
Division of Hazardous Materials Management

cc: Paula Cotter, DHMM,
Ken Westlake, U.S.

DJB:km

Enclosure

1944

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9:00-11:30 am 7-12-83
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # 02-18-0104

PART 1. GENERAL INFORMATION

U.S. EPA I.D. # OHD 003926748

Facility: Union Carbide Parma Technical Center Location: 12900 Snow Road
Address: P.O. Box 6116 City: Parma
State: Ohio Zip Code: 44130 County: Cuyahoga Telephone: 216-676-2000/-2645

INSPECTION PARTICIPANTS(S)

(Name)	(Title)	(Telephone)
1. <u>Eugenia Betonte</u>	<u>Environmental & Health Coordinator</u>	<u>216-676-2645</u>
2. _____	_____	_____
3. _____	_____	_____

INSPECTOR(S)

1. <u>Deborah J. Berg, R.S.</u>	<u>District Inspector</u>	<u>216-425-9171</u>
2. _____	_____	_____
3. _____	_____	_____

INSTALLATION ACTIVITY

Mark One

- ☐ Generator only (G)
- ☐ Transporter (T)
- ☐ TSDF only
- ☐ G-T
- ☒ G-TSDF
- ☐ T-TSDF
- ☐ G-T-TSDF

If the site is a TSDF, check the boxes indicating which regulations are applicable.

- ☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure
- ☒ Containers S01
- ☐ Tanks S02/T01
- ☐ Surface Impoundments S04/T02
- ☐ Incineration/Thermal Treatment
- ☐ Waste Piles S03
- ☐ Land Treatment D81
- ☐ Landfills D80
- ☐ Chemical/Physical/Biological T04
- ☐ Groundwater Monitoring
- ☐ Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has the facility submitted a Part A to Ohio?	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
2. If "yes", is it complete and accurate?	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
3. Has the facility submitted a Part B?	<u>—</u>	<u>✓</u>	<u>✓</u>	<u>—</u>

REMARKS, PART 1. GENERAL INFORMATION

Include a brief description of site activity and waste handling.

Union Carbide Corporation, Parma Technical Center is a Research & Development facility involving numerous laboratories and a pilot plant operation. RCRA hazardous wastes and non-hazardous wastes are accumulated and stored in two areas at this facility: 1) a 500-gallon (maximum) waste chemical storage area, located in the building east of the modular laboratory building; and 2) a 3500-gallon (maximum) drum storage area, located out-of-doors, west of the pilot plant. Small quantities of various laboratory wastes, some in original containers, are segregated by compatibility & stored at the waste chemical storage area until prepared for shipment as lab-packs. Detailed waste inventory logs are maintained for both storage areas.

Hazardous wastes handled at this facility include: waste solvents (F001, F002, F003, F005, F006, F007 & D002), characteristic wastes (D002, D003, D004 - D011), 25 acutely toxic (P) wastes, and 116 toxic (U) wastes.

Non-hazardous wastes include various oils, tars, & resins.

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>waste profile sheets prepared</i>
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>hazard class must be delineated on the manifest, even if wording is the same as shipping description</i>
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a))	✓	—	—	—
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) <u>or less</u> is affixed with a completed hazardous waste label as required by Section 262.32(b).	✓	—	—	—
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.	—	—	✓	placards provided by receiving TSD
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50.	—	—	✓	—
7. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	—	—	✓	—
b) The date that accumulation began is clearly marked on each container.	—	—	✓	—
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Section 262.34).	✓	—	—	—
9. The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records (Section 262.34).	✓	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

NOTE : SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention

D: Contingency and Emergency
E: Manifest/Records/Reporting

G: Closure
H: Financial Requirements

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the wastematerial containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	waste profiles & safety data sheets
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Section 265.13(b)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. a) Physical contact with the waste structures or equipment will not injure unknowing/unauthorized persons or livestock entering the facility (265.14(a)(1)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b) Disturbance of the waste will not cause a violation of the hazardous waste regulations (265.14(a)(2)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
IF <u>BOTH</u> 3a AND 3b ARE "YES", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				
a) A 24-hour surveillance system, <u>or</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) An artificial or natural barrier <u>and</u> a means to control entry at all times (265.14(b)(2)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark</u>
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265.14(c))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. a) The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. If required due to the actual hazards associated with <u>Ignitable, Reactive or incompatible</u> waste materials, the facility meets the following requirements (Section 265.17).				
a) Protection from sources of ignition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Physical separation of incompatible waste materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	comingling by trained personnel only; compatible wastes only

RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)	<u> </u>	<u> ✓ </u>	<u> </u>	<u> </u>
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)				
a) Internal alarm system.	<u> ✓ </u>	<u> </u>	<u> </u>	<u> </u>
b) Access to telephone, radio or other device for summoning emergency assistance.	<u> ✓ </u>	<u> </u>	<u> </u>	<u> </u>
c) Portable fire control equipment.	<u> ✓ </u>	<u> </u>	<u> </u>	<u> </u>
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	<u> ✓ </u>	<u> </u>	<u> </u>	<u> </u>
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)	<u> ✓ </u>	<u> </u>	<u> </u>	<u>by maintenance</u>
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)	<u> ✓ </u>	<u> </u>	<u> </u>	<u> </u>
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)	<u> ✓ </u>	<u> </u>	<u> </u>	<u> </u>
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a))	<u> ✓ </u>	<u> </u>	<u> </u>	<u>yearly visits</u>
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b))	<u> </u>	<u> </u>	<u> ✓ </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:
 - a) Actions to be taken by personnel in the event of an emergency incident.
 - b) Arrangements or agreements with local or state emergency authorities.
 - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.
 - d) A list of all emergency equipment including location, physical description and outline of capabilities.
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f))
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53)
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54)
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56)
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>personnel changes</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 which contains the following information:

- a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal. (262.73(b)(1))
- b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
- c) The estimated (or actual) weight, volume or density of the waste material(s).
- d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
- e) The present physical location of each hazardous waste within the facility.
- f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2))
- g) Records of any waste analyses and trial tests required to be performed.
- h) Records of the inspections required under Section 265.15 (General Inspection Requirements - Subpart B).
- i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6).
- j) Records of Closure cost estimates and ~~Post-Closure-(DISPOSAL-ONLY)~~ cost estimates required under Subpart G.

✓	—	—	<i>good records</i>
✓	—	—	—
✓	—	—	—
✓	—	—	—
✓	—	—	—
—	—	✓	—
✓	—	—	—
✓	—	—	—
—	—	✓	—
✓	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark</u> |
|--|-------------------------------------|--------------------------|--------------------------|---------------|
| 2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--|
| 3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) are noted in writing on the manifest document. (265.71(a)(2)) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) <u>or</u> the operator has submitted the required information to the Regional Administrator/Director. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

Subpart G: Closure and Post-Closure

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|--|
| 1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| a) A description of how and when the facility will be closed. (265.112(a)(1)). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	<u> </u>	<u> </u>	<u> ✓ </u>	<u> </u>
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)	<u> ✓ </u>	<u> </u>	<u> </u>	<u> </u>
d) A description of steps taken to decontaminate facility equipment.	<u> ✓ </u>	<u> </u>	<u> </u>	<u> </u>
e) The year closure is expected to begin and a schedule for the various phases of closure.	<u> ✓ </u>	<u> </u>	<u> </u>	<u> schedule </u>
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	<u> </u>	<u> </u>	<u> ✓ </u>	<u> </u>
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.			<u> ✓ </u>	

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143)
- a) A closure trust fund, or
 - b) A surety bond, or
 - c) A closure letter of credit, or
 - d) ~~A combination of financial mechanisms.~~ *financial test (\$10,000)*

NOTE : COMPLIANCE WITH THESE REGULATIONS IS A FEDERAL REQUIREMENT.

financial test (\$10,000)

liability insurance
(3 million - 6 million)

✓			PRE-USED A PRINTOUT
✓			PRE-USED A PRINTOUT

RCRA INTERIM STATUS INSPECTION FORM

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available.

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark</u>
------------	-----------	------------	---------------

<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
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REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173)	✓	—	—	—
b) In good physical condition (265.171)	✓	—	—	—
c) Compatible with the wastes stored in them (265.172)	✓	—	—	—
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))	✓	—	—	—
3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))	✓	—	—	—
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)	✓	—	—	—
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	✓	—	—	—
6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c))	✓	—	—	—

Re: DHMM
Union Carbide - Parma Technical Center
Cuyahoga County
02-18-0104

Ms. Eugenia Betonte
Union Carbide
Parma Technical Center
P.O. Box 6116
Cleveland, Ohio 44101

July 9, 1982

Dear Ms. Betonte:

Thank you for the courtesies extended by you during my July 1, 1982, inspection at the Union Carbide - Parma Technical Center. The purpose of this inspection was to ascertain compliance with state and federal hazardous waste management rules. A copy of the inspection report has been enclosed for your information.

The inspection report indicates that this storage facility, located at the Union Carbide - Parma Technical Center, 12900 Snow Road, Parma, Ohio, was in general compliance with the applicable Ohio Hazardous Waste Rules OAC 3745-50 thru 3745-58 and Federal Hazardous Waste Regulations 40 CFR 260-265.

A copy of the inspection report will be forwarded to U.S. EPA - Region V. Please feel free to contact me or Ms. Kathy Homer of U.S. EPA at (312) 886-3718, if you have any questions.

Sincerely,

Deborah J. Berg, R.S.
Environmental Scientist
Division of Hazardous Materials Management

DJB:km

Enclosure

cc: Kathy Homer, SIP, U.S. EPA - Region V
Paula Cotter, DHMM, C.O.
Peggy Vince, HWFAB, C.O.

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OH0 003926748

Facility: Union Carbide Parma Technical Center Location: 12900 Snow Road
Address: P.O. Box 6116 City: Parma
State: Ohio Zip Code: 44130 County: Cuyahoga Telephone: 216-676-2000
Facility Operator: Eugenia Betonte Title: Envir. & Health Coord. Telephone: 216-676-2645
Facility Owner: Union Carbide Corporation Address: Old Ridgebury Road
City: Danbury State: Conn. Zip Code: 06817 Telephone: 203 794-2000
Type of Ownership: ☒ Private ☐ Government State HWFAB No. 02-18-0104

Date of Inspection: 7-1-82 Time of Inspection: (Start) 9:00 a.m. (Finish) 12:30 p.m.
Advance Notification? ☐ No ☒ Yes: scheduled 6-14-82
Weather Conditions: sunny, temp. - high 60° F.'s.

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>Eugenia Betonte</u>	<u>Environmental & Health Coordinator</u>	<u>216-676-2645</u>
2.	<u></u>	<u></u>	<u></u>
3.	<u></u>	<u></u>	<u></u>
4.	<u></u>	<u></u>	<u></u>

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	<u>Deborah J. Berg</u>	<u>Environmental Scientist</u>	<u>214-425-9171</u>
2.			
3.			
4.			

1. Type(s) of hazardous waste site activity: A. ☒ Generation B. ☒ Storage C. ☐ Treatment
D. ☐ Transportation E. ☐ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: F001, F002, F003, F005, F006, F007

25 acutely toxic (P) wastes - see permit for specific codes

116 toxic (U) wastes - see permit for specific codes

b) Non-Listed Wastes: ☒ I ☒ C ☒ R ☒ T
D001 D002 D003 D000

D004 thru D011 - (EP TOXIC)

3. Has this facility submitted a Part A Permit Application? ☒ Yes ☐ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

☐ Yes, See Remark # ☒ No

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>drummed waste & labeled waste</i>
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>placards provided by transporter/disposal firm</i>
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
8. If the generator elects to store hazardous waste on-site in <u>containers or tanks for 90 days</u> or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
a) <u>Containers:</u> the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) The date that accumulation began is clearly marked on each container.	<u> </u>	<u> </u>	<u> ✓ </u>	<u> </u>
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	<u> </u>	<u> </u>	<u> ✓ </u>	<u> see part 4 </u>
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	<u> </u>	<u> </u>	<u> ✓ </u>	<u> see part 4 </u>
e) <u>Tanks:</u> the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	<u> </u>	<u> </u>	<u> ✓ </u>	<u> </u>
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	<u> </u>	<u> </u>	<u> ✓ </u>	<u> </u>
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	<u> </u>	<u> </u>	<u> ✓ </u>	<u> </u>
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	<u> </u>	<u> </u>	<u> ✓ </u>	<u> </u>
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	<u> ✓ </u>	<u> </u>	<u> </u>	<u> good program outline </u>
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	<u> ✓ </u>	<u> </u>	<u> </u>	<u> good documentation </u>

RCRA INTERIM STATUS INSPECTION FORM

11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.

Yes No N/A Remark #

_____ _____ ✓ _____

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency

E: Manifest/Records/Reporting
F: Ground Water Monitoring
G: Closure

H: Financial Requirements

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>well developed</u>
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>well developed</u>
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) 24-hour surveillance system.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>guards & TV surveillance</u>
b) Artificial or natural barrier completely surrounding the active portion of the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>fenced</u>
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Section 265.15 and 3745-55-15)	<u>✓</u>	—	—	—
a) Inspect emergency equipment.	<u>✓</u>	—	—	<u>schedule & log by maintenance</u>
b) Inspect monitoring equipment.	—	—	<u>✓</u>	—
c) Inspect security, alarm and communication devices.	<u>✓</u>	—	—	<u>by plant security</u>
d) Inspect process equipment (pipes, pumps, etc.).	—	—	<u>✓</u>	—
e) Inspect containment structures (dikes, curbs, etc.).	—	—	<u>✓</u>	—
f) Inspect facility for structural malfunctions (roof, floor, etc.).	—	—	<u>✓</u>	—
g) Inspect hazardous waste handling/loading areas each day used.	<u>✓</u>	—	—	—
h) Record of any malfunctions due to equipment or operator errors.	—	—	<u>✓</u>	—
i) Record of any hazardous waste discharges.	—	—	<u>✓</u>	—
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<u>✓</u>	—	—	<u>good program outline</u>
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	<u>✓</u>	—	—	<u>good documentation</u>
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).				

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Protection from sources of ignition.	<u>✓</u>	—	—	—
b) Physical separation of incompatible waste materials.	<u>✓</u>	—	—	—
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<u>✓</u>	—	—	—
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	<u>✓</u>	—	—	—

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).	—	<u>✓</u>	—	—
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	<u>✓</u>	—	—	—
a) Internal alarm system.	<u>✓</u>	—	—	<u>plant piping system</u>
b) Access to telephone, radio or other device for summoning emergency assistance.	<u>✓</u>	—	—	—
c) Portable fire control equipment.	<u>✓</u>	—	—	—
d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	<u>✓</u>	—	—	<u>city water</u>
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	<u>✓</u>	—	—	—
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	<u>✓</u>	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).	<u>✓</u>	—	—	—
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).	<u>✓</u>	—	—	<u>documented</u>
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).	—	—	<u>✓</u>	—

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	<u>✓</u>	—	—	—
a) Actions to be taken by personnel in the event of an emergency incident.	<u>✓</u>	—	—	—
b) Arrangements or agreements with local or state emergency authorities.	<u>✓</u>	—	—	—
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	<u>✓</u>	—	—	<u>primary & secondary coordinators</u>
d) A list of all emergency equipment including location, physical description and outline of capabilities.	<u>✓</u>	—	—	<u>spill pillows, hydrofluoric acid pillows, fire extinguishers & hoses, vermiculite, soda ash</u>
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).	<u>✓</u>	—	—	—
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).	<u>✓</u>	—	—	<u>letter & plan sent to Parma Police, Fire & Hospital; Fire visits plant once a week.</u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="text"/>

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
a) Description and quantity of each hazardous waste treated, <u>stored</u> or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b) (1) and 3745-55-73-B-1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
c) The estimated (or actual) weight, volume or density of the waste material(s).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>

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	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark#</u>
e) The present physical location of each hazardous waste within the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b) (2) and 3745-55-73-B-2).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="text"/>
g) Records of any waste analyses and trial tests required to be performed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|----------------------|
| 3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77). | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="text"/> |
|---|--------------------------|--------------------------|-------------------------------------|----------------------|

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|----------------------|
| 4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71). | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="text"/> |
|--|--------------------------|--------------------------|-------------------------------------|----------------------|

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	_____	_____	✓	_____
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	_____	_____	✓	_____
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.	_____	_____	✓	_____
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.	_____	_____	✓	_____

Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	_____	_____	✓	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.	_____	_____	<u>✓</u>	_____
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.	_____	_____	<u>✓</u>	_____

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	<u>✓</u>	_____	_____	_____
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	<u>✓</u>	_____	_____	_____
b) A description of how any of the <u>applicable</u> closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	_____	_____	<u>✓</u>	_____
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	<u>✓</u>	_____	_____	_____
d) A description of steps taken to decontaminate facility equipment.	<u>✓</u>	_____	_____	_____
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	_____	_____	<u>✓</u>	_____
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	_____	_____	<u>✓</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	___	___	✓	___
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	___	___	✓	___
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	___	___	✓	___
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	___	___	✓	___
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	___	___	✓	___

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	___	___	✓	___
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	___	___	✓	___
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	___	___	✓	___
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	___	___	✓	___

RCRA INTERIM STATUS INSPECTION FORM

- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|--|---------------|---------------|--------------|-----------------|
| 9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10. | <u> </u> | <u> </u> | <u> ✓ </u> | <u> </u> |

Subpart H: Financial Requirements

- | | | | | |
|--|--------------|---------------|---------------|-------------------------------------|
| 1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32). | <u> ✓ </u> | <u> </u> | <u> </u> | <u>engineer certification added</u> |
|--|--------------|---------------|---------------|-------------------------------------|

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51,-52-53).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>closed-top drums with plastic cover, drum waste codes stenciled</i>
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____ ☒ No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.) ☒ No

a) Applicable U.S. EPA I.D. Number _____

b) Ohio P.U.C.O. GR TRSF Number _____

7. A brief description of site activity:

* storage facility for hazardous waste generated from research laboratories & pilot plant activities.

a. storage area for drummed waste - outdoors storage - 3500 gallon capacity
for compatible solvents, etc., which are disposed by incineration

b. waste chemical storage area - indoor storage - 500 gallon capacity
for laboratory chemicals which are disposed by labpacking

REMARKS, PART 1. (GENERAL INFORMATION)

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>waste material profile sheets prepared for each hazardous waste by Union Carbide</i>
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>discussed in detail proper DOT shipping papers & classifications</i>
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	



Re: Application Number 81-HW-0104
Cuyahoga County

August 24, 1981

John Keeling
Administrator, Environmental Affairs
Union Carbide, Parma Technical Center
P.O. Box 6116
Cleveland, Ohio 44101

Dear Mr. Keeling:

On August 10, 1981, Deborah J. Berg of the Ohio EPA conducted an inspection of your facility as part of the Hazardous Waste Facility permit review process. Your facility was represented by John Keeling.

A copy of the inspection form is enclosed for your information. No unresolved deficiencies were noted, however, there may be comments included in the inspection form which you should consider.

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

A handwritten signature in cursive script, reading "Paul Flanigan", is written over the typed name.

Paul Flanigan, P.E.
Hazardous Waste Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V
Deborah J. Berg, NEDO

CERTIFIED MAIL

ST. IDENTIFICATION NUMBER

87-HM- 0104

EPA IDENTIFICATION NUMBER

OHD 003926748

TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A.- General Facility Standards

I. General Information:

- (A) Facility Name: Union Carbide Parma Technical Center
- (B) Street: 12900 Snow Road ~~XXXXXXXXXX~~
- (C) City: Parma (D) State: Ohio (E) Zip Code: 44130
- (F) Phone: 216-676-2228 (G) County: Cuyahoga
- (H) Operator: same as above
- (I) Street: _____
- (J) City: _____ (K) State: _____ (L) Zip Code: _____
- (M) Phone: _____ (N) County: _____
- (O) Owner: Union Carbide Corporation
- (P) Street: 270 Park Avenue
- (Q) City: New York (R) State: New York (S) Zip Code: 10017
- (T) Phone: 212-551-2345 (U) County: _____
- (V) Date of Inspection: 8-10-81 (W) Time of Inspection (From) 10:00 (To) 11:30
- (X) Weather Conditions: sunny & clear temperature low 70's.

(Y)	Person(s) Interviewed	Title	Telephone
	<u>John Keeling</u>	<u>Administrator, Environmental Affairs</u>	<u>216-676-2228</u>
	_____	_____	_____
	_____	_____	_____
(Z)	Inspection Participants	Agency/Title	Telephone
	<u>Gip Betonte</u> (as of <u>9-81</u>)	<u>Administrator, Environmental Affairs</u>	<u>216-676-2228</u>
	<u>David Mieskowski</u>	<u>Environmental Engineer</u>	<u>216-676-2228</u>
	<u>Sandy Kousek</u>	<u>Env. Tech. Ohio EPA</u>	<u>216-425-9171</u>
	<u>Deborah Berg</u>	<u>Env Sci II Ohio EPA</u>	<u>216-425-9171</u>
(AA)	Preparer Information		
	Name	Agency/Title	Telephone
	<u>Deborah J. Berg</u>	<u>Ohio EPA ES II</u>	<u>216-425-9171</u>

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- | | |
|--|--|
| <input checked="" type="checkbox"/> A. Storage and/or Treatment
1. Containers (I)
2. Tanks (J)
3. Surface Impoundments (K)
4. Waste Piles (L) | ___ D. Incineration and/or Thermal Treatment
(O and P) |
| ___ B. Land Treatment (M) | ___ E. Chemical, Physical, and Biological Treatment (Q) |
| ___ C. Landfills (N) | |

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				<i>N/A - not applicable</i>
1. Receipt of hazardous waste from a foreign source?	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>
2. Facility expansion?	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>✓</u>	<u> </u>	<u> </u>	<u>also - complete list of chemicals used in research facility</u>
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u>✓</u>	<u> </u>	<u> </u>	<u>note</u>
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<u>✓</u>	<u> </u>	<u> </u>	<u>note</u>
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	<u>✓</u>	<u> </u>	<u> </u>	<u>guard (day), TV surveillance (night)</u>
2. Artificial or natural barrier around facility?	<u>✓</u>	<u> </u>	<u> </u>	<u>entire plant fenced</u>
3. Controlled entry?	<u>✓</u>	<u> </u>	<u> </u>	<u>guard house at plant entrance</u>
4. Danger sign(s) at entrance?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	<u> </u>	<u> </u>	<u> </u>	<u>N/A none experienced</u>
2. Records of operator error?	<u> </u>	<u> </u>	<u> </u>	<u>N/A thus far - contingencies plan addresses</u>
3. Records of discharges?	<u> </u>	<u> </u>	<u> </u>	<u>N/A anticipated problems</u>

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
5. Safety, emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
6. Security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
7. Operating and structural devices?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>N/A</i>
8. Inspection log?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Since Nov 19, 1980</i>
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
2. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
3. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
4. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
5. Have facility personnel received required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
6. Do new personnel receive required training within six months?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
2. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----
3. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	-----

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

Yes No NI* Remarks

_____ ✓ _____ _____

(B) If required, does the facility have the following equipment:

1. Internal communications or alarm systems?

✓ _____ _____ see (D) below

2. Telephone or 2-way radios at the scene of operations?

✓ _____ _____

3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

✓ _____ _____

Indicate the volume of water and/or foam available for fire control:

(C) Testing and Maintenance of Emergency Equipment:

1. Has the owner or operator established testing and maintenance procedures for emergency equipment?

✓ _____ _____ monthly fire extinguisher check by maintenance department; presence & necessary volume of spill packets checked on weekly inspections.

2. Is emergency equipment maintained in operable conditions?

✓ _____ _____

(D) Has owner or operator provided immediate access to internal alarms? (if needed)

✓ _____ _____ Dial 2222 by phone activates alarm system (various codes for type of incident), and connects to receptionist to take specific details.

(E) Is there adequate aisle space for unobstructed movement? ☒

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

☒ ☐ ☐

facility had no previous SPCC plan - contingency plan complete & workable.

2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

☒ ☐ ☐

letters of notification & copies of contingency plan. Fire department is invited to visit plant yearly. Fire department is familiar with storage areas.

3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

☒ ☐ ☐

4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

☒ ☐ ☐

5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

☒ ☐ ☐

in-plant alarm system coded for evacuation

*Not Inspected

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u> no occurrence as of this time

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u> facility receives no outside shipments
2. Are records of past shipments retained for 3 years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>no shipments since Nov 19, 1988</u>
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u> ↑

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

✓

2. Does the operating record contain the following information:

- **b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

✓

also see III B 2-3

- c. The location and quantity of each hazardous waste within the facility?

✓

- ***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

N/A

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

*N/A**no incidents have occurred*

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

✓

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

Yes No NI* Remarks

(A) Closure and Post Closure

- | | | | | |
|---|-------------------------------------|-------------------------------------|--------------------------|-------|
| 1. Is the facility closure plan available for inspection by May 19, 1981? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | _____ |
| 2. Has this plan been submitted to the Regional Administrator | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | _____ |
| 3. Has closure begun? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | _____ |
| 4. Is closure estimate available by May 19, 1981? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | _____ |

(B) Post closure care and use of property

Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)

_____ N/A

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I

USE AND MANAGEMENT OF CONTAINERS

Facility Name: Union Carbide Parma Technical Center Date of Inspection: 8/10/81

Yes No NI* Remarks

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|-------------|
| 1. Are containers in good condition? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>note</u> |
| 2. Are containers compatible with waste in them? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | _____ |
| 3. Are containers stored closed? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | _____ |
| 4. Are containers managed to prevent leaks? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | _____ |
| 5. Are containers inspected weekly for leaks and defects? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | _____ |
| Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | _____ |

Yes No NI Remarks

7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)

✓

8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?

✓

*separate shelf areas
in waste commercial
chemical storage area
for organics, inorganics, acids*

J
TANKS N/A

Facility Name: _____

Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?

2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?

3. Do continuous feed systems have a waste-feed cutoff?

4. Are waste analyses done before the tanks are used to store a substantially different waste than before?

5. Are required daily and weekly inspections done?

6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)

*Not Inspected

Yes No NI* Remarks

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS *N/A*

Facility Name: _____

Date of Inspection: _____

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?

2. Do earthen dikes have protective covers?

3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?

4. Is the freeboard level inspected at least daily?

5. Are the dikes inspected weekly for evidence of leaks or deterioration?

6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)

WASTE PILES *N/A*

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	---	---	---	-----
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	---	---	---	-----
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	---	---	---	-----
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	-----
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	---	---	---	-----
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	-----
7. Are piles of incompatible waste protected by barriers or distance from other waste?	---	---	---	-----

*Not Inspected

M

LAND TREATMENT

N/A

Facility Name: _____

Date of Inspection: _____

1. Is treated hazardous waste capable of biological or chemical degradation?

2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?

3. Is waste analyzed according to 265.273?

4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?

5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?

6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?

7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?

8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)

9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)

N
LANDFILLS *N/A*

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
(A) General Operating Requirements				
Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	---	---	---	-----
**2. Collection of run-off from active portions of the fill?	---	---	---	-----
**3. Is collected run off treated?	---	---	---	-----
4. Control of wind dispersal of hazardous waste?	---	---	---	-----
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping				
Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	---	---	---	-----
2. The contents of each cell and the location of each hazardous waste type within each cell?	---	---	---	-----
(C) Closure and Post-Closure				
1. Is the Closure Plan available for inspection by 5-19-81?	---	---	---	-----
2. Has this plan been submitted to the Regional Administrator?	---	---	---	-----
3. Has closure begun?	---	---	---	-----
4. Is closure cost estimate available by 5-19-81?	---	---	---	-----
(D) Special requirements for ignitable or reactive waste				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?				
	---	---	---	-----

	Yes	No	NI*	Remarks
--	-----	----	-----	---------

(If waste is rendered non-reactive or non-ignitable see treatment requirements)

If not, the provisions of 40 CFR 265.17(b) apply.

--	--	--	--	--

(E) Special Requirements for Incompatible Wastes.

Does the owner or operator dispose of incompatible wastes in separate cells?

--	--	--	--	--

If not, the provisions of 40 CFR 265.17(b) apply.

--	--	--	--	--

(F) Special requirements for liquid waste (effective 11-19-81)

1. Are bulk or non-containerized liquids placed in the landfill?

--	--	--	--	--

2. Does the landfill have a chemically and physically resistant liner system?

--	--	--	--	--

3. Does the landfill have a functional leachate collection system?

--	--	--	--	--

4. Are free liquids stabilized prior to or immediately after placement in the landfill?

--	--	--	--	--

(G) Special requirements for Containers (effective 11-19-81)

Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?

--	--	--	--	--

O and P
INCINERATION and THERMAL TREATMENT

N/A

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste?

Component	Yes	No	NI*	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____

*Not Inspected

Yes No NI* Remarks

2. Has documented or written data been substituted for analysis of either:

a. Lead?

b. Mercury?

B. List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

Remarks

1. _____

2. _____

3. _____

4. _____

5. _____

III. Monitoring and Inspections

Yes No NI* Remarks

A. Are combustion/emission control instruments monitored at least every 15 minutes?

B. Is steady state maintained or corrections attempted?

C. Is stack plume observed at least hourly for normal color and opacity?

D. Did any stack observations made by owner or operator show a plume different than normal?*

E. If yes to D above, were corrections made to return emissions to normal appearance?*

F. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?

G. Are emergency shutdown controls and system alarms checked daily for proper operation?

*No inspected

**Specify in Remarks for what period of time this was checked.

IV. Open burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)	_____	_____	_____	_____
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	_____	_____	_____	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,001 to 30,000.....	690 m	2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

N/A

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	_____	_____	_____	_____
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	_____	_____	_____	_____

*Not Inspected

	Yes	No	NI*	Remarks
2. Has the owner or operator addressed the waste analysis requirements of 265.402?	_____	_____	_____	_____
4. Are inspection procedures followed according to 265.403?	_____	_____	_____	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	_____	_____	_____	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	_____	_____	_____	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

I. MANIFEST REQUIREMENTS



	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	_____	_____	_____	_____
<u>Note</u>				
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	_____	_____	_____	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	_____	_____	_____	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	_____	_____	_____	_____
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	_____	_____	_____	_____
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	_____	_____	_____	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	_____	_____	_____	_____
7. Required certification?	_____	_____	_____	_____
8. Required signatures?	_____	_____	_____	_____
(C) Does the owner or operator submit exception reports when needed?	_____	_____	_____	_____

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<u>Note</u> ↑ ✓	_____	_____	_____
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	_____	_____	_____	see note
(C) If required, are placards available to transporters of hazardous waste?	_____	_____	_____	see note

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation *N/A*

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	_____	_____	_____	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	_____	_____	_____	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	_____	_____	_____	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	_____	_____	_____	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	_____	_____	_____	_____
c. Do continuous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
d. Are required daily and weekly inspections done?	_____	_____	_____	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	_____	_____	_____	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	_____	_____	_____	_____

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	—	—	—	<u>N/A</u>
(B) Has the generator submitted Annual Reports and Exception Reports as required?	—	—	—	<u>N/A</u>

VII. INTERNATIONAL SHIPMENTS ← N/A
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?	—	—	—	—
--	---	---	---	---

(If answered Yes, complete the following as applicable.)

- | | | | | |
|--|---|---|---|---|
| 1. Exporting Hazardous waste, has a generator: | | | | |
| a. Notified the Administrator in writing? | — | — | — | — |
| b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? | — | — | — | — |
| c. Met the Manifest requirements? | — | — | — | — |
| 2. Importing Hazardous Waste, has the generator: | | | | |
| Met the manifest requirements? | — | — | — | — |

X
TRANSPORTER REQUIREMENTS *./A*
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	_____	_____	_____	_____

II. INTERNATIONAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?	_____	_____	_____	_____
B. Are signed completed manifest(s) on file?	_____	_____	_____	_____

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?	_____	_____	_____	_____
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	_____	_____	_____	_____

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*N Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

III B. 2. Company has detailed log of waste materials generated from pilot plant and research facility. By the nature of these operations, composition of waste materials is known without further analysis. However, waste analysis plan does contain a detailed plan for subsequent analysis, should it be necessary.

III B 3. Company utilizes an inter-departmental logging system for collecting compatible and like waste materials for drum containment. Each drum is coded with a number and a listing of its contents. A log sheet accompanies each drum with a complete listing of specific chemicals, volumes, and departments from which the materials originated.

VIII. I. 1. This company has delineated two storage areas: 1) drummed storage area - for liquid ignitable wastes (0001 & some waste commercial products); and, 2.) waste commercial chemical storage area - which contains typical laboratory-sized glass containers, etc. of chemicals. Although

IX 1. No hazardous wastes have been shipped from the facility since Nov. 19, 1980, and thus generator has not completed any manifest forms. I did question ~~Mr.~~ Mr. Keeling about manifesting procedures and am confident that he is knowledgeable of his responsibilities.

IX 2. As above, no hazardous wastes have been shipped off-site. Drummed waste & waste from waste commercial chemical storage area were coded with company numbering system digits. Again, after questioning Mr. Keeling, I determined that he is knowledgeable of DOT labeling & packaging requirements, and placarding requirements.

Company personnel are very knowledgeable & quite prepared for any emergencies.